

General

The Intervest Code of Conduct clearly indicates which principles, standards and values guide us in the execution of our work. Everyone in our organisation is expected to know the Code of Conduct and has a duty to comply with it.

We believe it is of great importance that employees and third parties can safely and adequately report any suspicions of violations of our Code of Conduct.

To this end, Intervest has developed this procedure to ensure that employees can report any irregularities that have been noticed without fear of any retaliation, and that findings are dealt with through an unambiguous working method.

Scope

This procedure concerns a suspicion, based on reasonable grounds, of:

- unacceptable behaviour, harassment and violence at work;
- corruption, bribery, extortion and other criminal offences;
- violation of laws and regulations;
- deliberate circumvention of internal procedures and regulations;
- knowingly providing incorrect or unlawful information to stakeholders;
- deliberately violating rules on information security;
- deliberately withholding, destroying or manipulating information about facts that could cause damage to Intervest;
- consciously trading in shares during so-called “closed” periods;
- other unfair or unethical practices, etc.

Intervest takes all reports concerning irregularities and/or alleged irregularities seriously. These will be treated fairly and adequately and, to the extent possible, confidentially, unless otherwise agreed.

Procedure

1. Reporting point

- a) In the event of a situation falling within the scope of this reporting procedure, the employee must report it immediately to Intervest’s prevention officer.
- b) However, if it is not possible to report the findings to the prevention officer for whatever reason, the employee must contact the compliance officer directly.
- c) If the finding concerns a member of the management board, he or she can directly address the chairperson of the audit and risk committee
- d) The prevention officer who has received a report of specific irregularities and/or suspected irregularities is obliged to report these immediately to the compliance officer.
- e) Business partners (such as freelancers and suppliers) must contact the compliance officer directly.

2. Investigation

Each report is recorded in a register along with the date of the notification, the name of the person notifying, the nature of the violation and - later - how the case was handled. This register is kept in a secure folder with access for authorised persons only.

Persons (employees or third parties) who have expressed concerns will be informed about who will be dealing with the case and whether any further assistance is required of them. Persons notifying will receive feedback insofar as possible, without violating legal obligations (such as privacy legislation or other confidentiality obligations).

In addition to the relevant managers, the compliance officer - or if necessary the chairperson of the audit and risk committee - is responsible for initiating and overseeing any investigations into potential malpractices resulting from this reporting procedure.

3. Protection

Insofar as possible, both the possible existence of the malpractice and the identity of the person notifying will be treated confidentially. In any case, the identity of the person notifying will not be disclosed without prior consent.

If revealing the identity of the person notifying is necessary to resolve the case (e.g. in court proceedings), a dialogue will be entered into with the person notifying in question on how to proceed further.

Persons notifying are deemed only to make claims in good faith. No form of intimidation, reprisal or any other form of retaliation will be tolerated against anyone who has expressed a genuine concern.

The report will in no way have a negative impact on this person's functioning within the organisation.

4. Contact

Prevention officer: Aimee.VanOngevalle@intervest.be

Compliance officer: Kevin.Degreef@intervest.be

Chairperson of the audit and risk committee: Marleen Willekens

External reporting point:

For violations of a psychosocial nature - such as violence, harassment and unacceptable behaviour at work - that are not possible to report internally for whatever reason, employees may also contact the following external persons:

Confidential Officer: veronique.willems@mensura.be

Occupational Physician: Philippe.Landtmeters@mensura.be